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Proposed Counsel for Debtors

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

In Re:	§	
	§	Case No. 19-40067-11
SOVRANO, LLC, <i>et al.</i> , ¹	§	
	§	Chapter 11
Debtors.	§	
	§	(Jointly Administered)
	§	

NOTICE OF HEARING

PLEASE TAKE NOTICE that a hearing on the following motion:

- Motion Of Insured Debtors For Modification Of The Automatic Stay To Allow For Reimbursement And/Or Payment Of Defense Costs Under Debtors' Insurance Policies Pursuant To 11 U.S.C. § 362(D)(1) And Fed. R. Bankr. P. 4001 [Docket No. 100]

(the "Motion") is scheduled for **February 28, 2019 at 1:30 p.m.** before the Honorable Edward L. Morris, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Northern District of Texas-Fort Worth Division, 501 West Tenth Street, Room 204, Fort Worth, Texas 76102. In the event no responses are filed to the Motion, this Court may enter an order granting the relief sought in the Motion without a hearing.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Sovrano, LLC (1470); Mr. Gatti's, LP (0879); Gatti's Great Pizza, Inc. (6061); Gigi's Cupcakes, LLC (8356); Gigi's Operating, LLC (0621); Gigi's Operating II, LLC (8396); and KeyCorp (1251)..

PURSUANT TO LOCAL BANKRUPTCY RULE 4001-1(b), A RESPONSE IS REQUIRED TO THIS MOTION, OR THE ALLEGATIONS IN THE MOTION MAY BE DEEMED ADMITTED, AND AN ORDER GRANTING THE RELIEF SOUGHT MAY BE ENTERED BY DEFAULT.

ANY RESPONSE SHALL BE IN WRITING AND FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AT 501 W. TENTH STREET, ROOM 147, FORT WORTH, TEXAS 76102-3643 BEFORE CLOSE OF BUSINESS ON FEBRUARY 22, 2019, WHICH IS AT LEAST 14 DAYS FROM THE DATE OF SERVICE HEREOF. A COPY SHALL BE SERVED UPON COUNSEL FOR THE MOVING PARTY AND ANY TRUSTEE OR EXAMINER APPOINTED IN THE CASE. ANY RESPONSE SHALL INCLUDE A DETAILED AND COMPREHENSIVE STATEMENT AS TO HOW THE MOVANT CAN BE "ADEQUATELY PROTECTED" IF THE STAY IS TO BE CONTINUED.

Respectfully submitted,

By: /s/ Nancy Ribaldo
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Proposed Counsel for Debtors

CERTIFICATE OF SERVICE

I hereby certify that on February 11, 2019, I caused a true and correct copy of the foregoing document to be served via first class mail and/or ECF if available, upon all parties on the Official Service List (attached for filing purposes only).

/s/ Nancy Ribaldo
Nancy Ribaldo

2868795.1

Sovrano, LLC, et al.
Case No. 19-40067-11
Official Service List
02/11/2019

DEBTORS' COUNSEL

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Gatti's Great Pizza, Inc.
Gigi's Cupcakes, LLC
Gigi's Operating, LLC
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